

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NORTH PLAINS SYSTEMS CORP.

Plaintiff,

Civil Action No.: 08-CV-00412

-against-

LIVID MEDIA LLC,

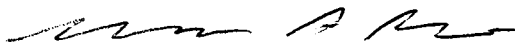
Defendant.
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NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying declaration of Richard A. Pretti, as well as the memorandum of law and supporting exhibits, plaintiff will move this Court before the Hon. Paul A. Crotty, at a time and place to be set by the Court, for a judgment by default pursuant to Fed R. Civ. P. 55(2) and Local Civil Rule 55.2(b), against defendant Livid Media LLC in the amount of \$171,024.49 with continuing interest thereon at the rate of \$77.88 per day from the date of issuance of the Complaint (January 16, 2008) to the date of Judgment, as well as costs and attorneys' fees in the amount of \$11,340.93 as of February 28, 2008 and continuing thereon until the disposition of this action, plus such other and further relief as this Court deems just and proper.

Dated: New York, New York
April 3, 2008

KAUFMAN BORGEEST & RYAN LLP



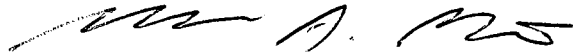
By: Richard A. Pretti
Jonathan B. Bruno
Attorneys for Plaintiff,
NORTH PLAINS SYSTEMS CORP.
99 Park Avenue, 19th Floor
New York, New York 10016
Telephone No.: (212) 980-9600
KBR File No.: 860.173

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing NOTICE OF MOTION, MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT, and DECLARATION OF RICHARD A. PRETTI, was served via REGULAR MAIL on the 4th day of April 2008 upon:

Livid Media LLC
One Glenlake Parkway
Suite 700
Atlanta, GA 30328

Livid Media LLC
100 Park Avenue
Sixteenth Floor
New York, New York 10017

A handwritten signature in blue ink, appearing to read 'Richard A. Pretti', is written over a horizontal line.

Richard A. Pretti